

September 18, 2014

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Ms. Bonnie Hriczko Removal Action Branch U.S. Environmental Protection Agency, Region II 2890 Woodbridge Avenue, MS-211 Edison, NJ 08837

Mr. William Tucker, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007

Subject: Response to Request for Information on Superior Barrel and Drum Site, Elk, Gloucester County, NJ Dated August 27, 2014

Dear Ms. Hriczko:

On September 3, 2014, Polymeric Systems, Incorporated (PSI) received a request for information pursuant to §104 of CERCLA for the Superior Barrel and Drum Site located in Elk Township, NJ. PSI personnel have reviewed the inquiry and have found no records of conducting business with the aforementioned company.

As contained in the instructions to the request for information, responses to the questions in the request are enclosed. Should the Agency require additional information, please contact either myself or Charles Maul, Esq. directly.

Best regards,

Thomas J Hmiel

Global Regulatory Affairs Manager

Whitford Corporation / Polymeric Systems, Inc.

Enclosures: 1

C:

C. Maul, Esq.

D. Parkes

1. Company Information

a. State the correct legal name of the Company.

Response: The name of the Company is Polymeric Systems, Inc.

Source: Amended Articles of Incorporation and Resolutions

b. Identify the legal status of the Company (corporation, partnership, specify if other) and state in which the Company was organized.

Response: The legal status of the Company is a Corporation organized in the state of Delaware.

Source: Amended Articles of Incorporation and Resolutions

c. State the names and addresses of the President, Chairman of the Board and Chief Executive Officer of the Company.

Response: The President, Chairman of the Board and Chief Executive Officer of the Company is David Willis, President, 150 Bell Tavern Lane Downingtown, PA 19335

Source: Amended Articles of Incorporation and Resolutions

d. Provide the name of an attorney, if any, who will serve as the legal contact for your Company in this matter.

Response: The Company will be represented by Charles A. Maul, Esq.

e. If your company is a subsidiary or affiliate of another corporation, or has subsidiaries itself, identify each such entity and its relationship to your Company.

Response: The Company is a subsidiary of Whitford Worldwide Company. The Company has one subsidiary, PSI Qinhuangdao Chemical located in Qinhuangdao, China.

Source: Corporate Tax Return

f. Identify the state and date of incorporation and the agent for service of process in the State of incorporation and in the State of New Jersey for your Company and for each entity identified in your response to Question 1(e), above.

Response: The Company was incorporated in Delaware on December 4, 1969. CTA Corporation is the agent for service of process.

Source: Amended Articles of Incorporation and Resolutions

g. If the Company is a successor to, or has been succeeded by another entity, identify each such other entity and provide the same information requested above for each.

Response: This question is not applicable. Please note that Polymeric Systems, Inc. was purchased by Whitford Worldwide Company on July 1, 2004.

Source: Amended Articles of Incorporation and Resolutions

h. If the Company transacted business with SBD in the name of an entity not already disclosed above, give the name of such entity and state its relationship to the Company.

Response: Not Applicable

Source: Amended Articles of Incorporation and Resolutions

2. Response: No. PSI has no record of any business transactions of any nature with Superior Barrel and Drum Company.

Source: Vendor and Customer records and interviews with current employees, former employees, and former owners.

- 3. Response: Not Applicable, refer to response to Question 2
- 4. Response: Not Applicable, refer to response to Question 2
- 5. Response: Not Applicable, refer to response to Question 2
- 6. Response: Not Applicable, refer to response to Question 2
- 7. Response: Not Applicable, refer to response to Question 2
- 8. Response: Not Applicable, refer to response to Question 2
- 9. Response: Not Applicable, refer to response to Question 2
- 10. Response: Not Applicable, refer to response to Question 2
- 11. Response: Not Applicable, refer to response to Question 2
- 12. Response: Not Applicable, refer to response to Question 2
- 13. Response: Not Applicable, refer to response to Question 2
- 14. Response: Not Applicable, refer to response to Question 2

15. Response: The following individual were consulted in developing the responses to this inquiry as follows:

Question 1 -

Joshua Reese Worldwide Controller Whitford Corporation 47 Park Avenue, Box 80 Elverson, PA 19520 (610)286-3529

Steve A. Hanak, US Controller, Finance Whitford Corporation 47 Park Avenue, Box 80 Elverson, PA 19520 (610)-286-3556

Question 2 -

Debra Parkes, General Manager Polymeric Systems, Inc. 47 Park Avenue, Box 522, Elverson, PA 19520 (610)286-2532

Jack Kane Vice President of Sales Polymeric Systems, Inc. 47 Park Avenue, Box 522, Elverson, PA 19520 (610)286-2501

Terry C. Erb Operations Manager Polymeric Systems, Inc. 47 Park Avenue, Box 522, Elverson, PA 19520 (610)286-2518

Dorothy Fletcher Purchasing Manager Polymeric Systems, Inc. 47 Park Avenue, Box 522, Elverson, PA 19520 (610)286-2520

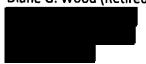
Jill Schultz
Purchasing Manager
Whitford Corporation
47 Park Avenue, Box 80
Elverson, PA 19520
(610)286-3532

Robert L. Trout Manager, Regulatory Affairs Whitford Corporation 47 Park Avenue, Box 80 Elverson, PA 19520 (610)286-3565

Thomas J. Hmiel Global Regulatory Affairs Manager Whitford Corporation 47 Park Avenue, Box 80 Elverson, PA 19520 (610)286-2554

Charles A. Maul, Esquire General Counsel Whitford Corporation 47 Park Avenue, Box 80 Elverson, PA 19520 (610)286-2568

Diane G. Wood (Retired)



Theodore R. Flint (Former Owner)



- 16. Response: No additional personnel are known to have or expected to have knowledge of facts relating to the questions which are the subject of this inquiry.
- 17. Response: No additional information is available.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

State of <u>Pennsylvania</u>: County of <u>Chester</u>

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

THOMAS J. HMIEL NAME (print or type)

GLOBAL REGULATORY AFFAIRS MANAGER

TITLE (print or type)

SIGNATURE

Sworn to before me this 18th day of Suplember, 2014

Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Sharon Masewicz, Notary Public
Elverson Boro, Chester County
My Commission Expires Nov. 15, 2016
MEMBER, PENNSYLVANIA ASSOCIATION OF MOTARIES









Ms. Bonnie Hriczko Removal Action Branch U.S. Environmental Protection Agency, Region II 2890 Woodbridge Ave., MS-211 Edison, NJ 08837

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1. Article Addressed to: Polymeric Systems, Inc. c/o Whitford	D. is delivery address different to term 1?
47 Park Ave. Elverson, PA 19520 Attn: Diane Wood	3. Service Type Certified Mail* Priority Mail Express** Registered Return Receipt for Merchandise Insured Mail Collect on Delivery 4. Restricted Delivery? (Extra Fee)
2. Article Number 7013 1090 0002 2838 0185	
PS Form 3811, July 2013 Domestic Return Receipt	

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Bonnie Hriczko